

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI  
TO PUBLIC REPRESENTATIVE INTERROGATORY  
(PR/USPS-T4—15)  
(April 17, 2012)**

The United States Postal Service files the response of witness Neri (USPS-T-4) to the above-listed interrogatory of the Public Representative dated April 3, 2012. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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April 17, 2012

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**PR/USPS-T-4-15**

Understanding that any estimate is subject to the current uncertainty over which facilities will be eliminated and how the network will be restructured, please estimate the following:

- a. Percentage of Priority Mail, by revenue and piece count, which will maintain its current service standard, the percentage whose standard will be increased by one day, and the percentage whose standard will increase by two days (if any),
- b. Percentage of Express Mail, by revenue and piece count, which will maintain its current service standard, and the percentage whose standard will be increased by one day,
- c. Percentage of First-Class Mail, by revenue and piece count, which will maintain its current service standard, the percentage whose standard will be increased by one day, and the percentage whose standard will increase by two days (if any),
- d. Percentage of Periodicals mail, by revenue and piece count, which will maintain its current service standard, the percentage whose standard will be increased by one day, and the percentage whose standard will increase by two or more days ,
- e. Percentage of Standard Mail, by revenue and piece count, which will maintain its current service standard, the percentage whose standard will be increased by one day, and the percentage whose standard will increase by two or more days ,
- f. Percentage of package services mail and piece count, by revenue, which will maintain its current service standard, the percentage whose standard will be increased by one day, and the percentage whose standard will increase by two or more days.
- g. Please confirm that no other categories of mail will be affected by these service standard changes. If you cannot confirm, then for any other category that is affected, please provide an estimate of the percentage of that mail category, by revenue and piece count, which will maintain its current service standard and the percentage whose standard will be increased.

**RESPONSE:**

a-b. Please see the responses to interrogatories APWU/USPS-T1-34(a) and APWU/USPS-T4-3 and 4.

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**RESPONSE to PR/USPS-T4-15 (continued):**

- c. Please see the responses to Presiding Officer's Information Request No. 1, Question 1, and interrogatories NPPC/USPS-T1-4 and DBP/USPS-2 and 3.
- d. Please see the response to interrogatory APWU/USPS-T4-2(i-j).
- e. The information requested by this interrogatory part is not available to the Postal Service at this time. No Postal Service data system contains end-to-end data for Standard Mail which could provide the basis for the requested analysis.
- f. Please see the response to interrogatory APWU/USPS-T1-33.
- g. I am aware of no other categories of mail that will be affected by the changes proposed in this docket.